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Attorneys for Defendant Meta Platforms, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

MAXIMILIAN KLEIN, et al., on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

META PLATFORMS, INC., a Delaware
Corporation,

Defendant.

Case No. 5:20-cv-08570-JD

**[PROPOSED] ORDER REGARDING
COMBINED ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
PORTIONS OF BRIEFING FOR
MOTION TO DISMISS THE FIRST
AMENDED CONSOLIDATED
ADVERTISER CLASS ACTION
COMPLAINT**

Judge: Hon. James Donato

THIS MATTER, having come before the Court on Defendant's Combined Administrative Motion to File Under Seal Portions of Briefing for Motion to Dismiss the First Amended Consolidated Advertiser Class Action Complaint, and the Court having considered the Declaration of Jitin Khurana In Support of Defendant's Administrative Motion to Seal, and other appropriate papers:

The Court finds compelling reasons to support the filing under seal of the portions of documents described herein. Accordingly,

IT IS ORDERED that the following portions of documents shall be filed under seal and sealed from the public record:

Document	Information sought to be sealed	Reason for Sealing
Defendant's Motion to Dismiss the First Amended Consolidated Advertiser Class Action Complaint (Dkt. 262)	Highlighted portion of lines 8 and 9 at page 11.	Contains non-public information regarding specific terms of contracts with business counterparties which, if revealed to competitors or counterparties, could cause competitive harm to Meta. <i>See</i> Khurana Decl. ¶¶ 6, 7.
Advertiser Plaintiffs' Opposition to Meta's Motion to Dismiss (Dkt. 271)	Highlighted portion of lines 10 to 12 at page 5.	Contains non-public information regarding specific terms of contracts with business counterparties which, if revealed to competitors or counterparties, could cause competitive harm to Meta. <i>See</i> Khurana Decl. ¶¶ 6, 7.
Advertiser Plaintiffs' Opposition to Meta's Motion to Dismiss (Dkt. 271)	Highlighted portion of lines 16 to 18 at page 6.	Contains non-public information regarding specific terms of contracts with business counterparties which, if revealed to competitors or counterparties, could cause competitive harm to Meta. <i>See</i> Khurana Decl. ¶¶ 6, 7.
Advertiser Plaintiffs' Opposition to Meta's Motion to Dismiss (Dkt. 271)	Highlighted portion of lines 21 to 24 at page 12.	Contains non-public information regarding specific terms of contracts

with business counterparties which, if revealed to competitors or counterparties, could cause competitive harm to Meta. *See* Khurana Decl. ¶¶ 6, 7.

IT IS SO ORDERED.

Dated: April _____, 2022

The Honorable James Donato
United States District Court Judge